



The Commonwealth of Massachusetts

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

FIRST SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO BOSTON EDISON COMPANY, CAMBRIDGE ELECTRIC LIGHT COMPANY, COMMONWEALTH ELECTRIC COMPANY AND NSTAR GAS COMPANY DTE 05-85

Pursuant to 220 C.M.R. § 1.06 (6)(c), the Department of Telecommunications and Energy ("Department") submits to Boston Edison Company ("BECo"), Cambridge Electric Light Company ("Cambridge"), Commonwealth Electric Company ("Commonwealth") (together "NSTAR Electric") and NSTAR Gas Company ("NSTAR Gas," collectively with NSTAR Electric, the "Companies") its First Set of Information Requests relative to their petition for approval of a rate settlement agreement ("Settlement") entered into with the Attorney General of the Commonwealth of Massachusetts, the Low-Income Energy Affordability Network and the Associated Industries of Massachusetts.

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of requests, a reference to request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Companies or any of their witnesses receive or generate additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how

the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work papers.

5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notation or other markings that differentiate such copies from the original.
6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve copies of the responses as follows: (a) an original and ten (10) copies to Mary L. Cottrell, Secretary of the Department; and (b) one (1) copy to all parties. All written documents (except those for which confidential treatment is sought) should also be submitted to the Department in electronic format using one of the following methods: (1) by e-mail attachment to dte.efiling@state.ma.us and to Shaela.Collins@state.ma.us; or (2) on a 3.5" disk, IBM-compatible format. The text of the e-mail or the disk label must specify: (1) the docket number of the proceeding (D.T.E. 05-85), (2) name of the person or company submitting the filing, and (3) a brief descriptive title of the document (e.g., Response to Information Requests). The electronic filing should also include the name, title and phone number of a person to contact in the event of questions about the filing. Text responses should be created in either Corel WordPerfect, Microsoft Word, or as an Adobe-compatible PDF file. Data or spreadsheet responses should be compatible with Microsoft Excel. Documents submitted in electronic format will be posted on the Department's Website, <http://www.mass.gov/dte>.

Requests

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| DTE 1-1 | Refer to Section 2.14 of the Settlement. Please identify the interest rate that will be used by NSTAR Gas in the calculation of the carrying charges cited in this section. |
| DTE 1-2 | Refer to Exhibit NSTAR-GOL/CLV-1 at 36. Please provide complete and detailed documentation of the existence of a thirty-day convention for calculating energy-related working capital. In addition, identify any supporting Department precedent for the use of a thirty-day convention in determining gas working capital requirements. |

- DTE 1-3
- (a) Under the terms of the Settlement, will NSTAR Gas's Gas Working Capital Allowance Calculation differ from the methodology currently employed by NSTAR Gas?
 - (b) If the Gas Working Capital Allowance Calculation has changed, describe the new methodology and provide complete and detailed documentation of its derivation, including underlying data in Microsoft Excel format with formulas and links included in cells.
 - (c) If NSTAR Gas is proposing to change its Gas Working Capital Allowance Calculation, identify the number of days lag figure NSTAR Gas is proposing to utilize in future calculations.
 - (d) If NSTAR Gas is proposing a new Gas Working Capital Allowance Calculation methodology or a number of days lag period other than the current 16 day figure, quantify the absolute and percentage difference that these changes would have had in NSTAR Gas's gas working capital allowance over the course of 2005. Provide historical 2005 gas working capital amounts as well as the theoretical 2005 gas working capital amounts (based on any proposed methodology and/or new days lag figure).
 - (e) Did NSTAR Gas perform an updated lead-lag study for its Gas Working Capital Allowance Calculation in preparation for the rate case filing with the Department? If so, provide a copy of the study to the Department.
- DTE 1-4 Refer to Section 2.18 of the Settlement. Please:
- (a) Explain the rationale for reclassification of Cambridge's 13.8 kV transmission facilities as distribution facilities.
 - b) Explain whether and, if so, how reclassification of Cambridge's 13.8 kV facilities would affect the transmission, distribution, and the overall rates paid by the ratepayers.
- DTE 1-5 Refer to Sections 2.23 through 2.31 of the Settlement. Please explain whether the service quality provisions proposed within the Settlement are intended to replace the Department's existing service quality guidelines as developed in D.T.E. 99-84.

- DTE 1-6 Refer to Sections 2.23 through 2.31 of the Settlement. Please explain whether a service quality penalty under the Agreement would be separate (and incremental to) or part of the two percent of transmission and distribution revenues identified in G.L. c. 164, §1E and D.T.E. 99-84.
- DTE 1-7 Please explain whether the Settlement is intended to exempt NSTAR Electric or NSTAR Gas from modifications to the Department's service quality guidelines such as may be contemplated in D.T.E. 04-116.